

Permitting Workgroup Issue Identification

	Issue	Recommendation	Benefit	Comment	Status	Valid Issue	Priority
P1	Currently, there is a duplicative data double entry problem at One Stop resulting from the necessity of entering data into both EMS and Permits Plus	None – should be resolved through conversion to ACCELA.	Accela in progress to resolve	Conversion to new ACCELA data management system will resolve this issue.	Resolved –only if and when Accela is up and running		
P2	Applicants want multiple mailing options for different aspects of their interaction with the department – that need is not being met by the current system. Some mail is returned as identified contact individuals move.	Create multiple mailing options (boxes) on permit applications to provide at least two contacts. Specify type of contact.	This would improve the ability to contact responsible persons at a source. Different people are contacts for different purposes.	Conversion to new ACCELA data management system will resolve this issue.	Resolved- only if and when Accela is up and running		
P3	If an applicant mails an application to the department, the applicant does not get an acknowledgement of receipt from the department.	Issue a letter confirming receipt of an application that has been mailed-in. EMS has the capability to generate acknowledgment electronically (as in Complaints).	An applicant will not have to second guess or follow up with a call to verify if we did receive their application. Provides for better documentation. Improved customer service.		Recommendation developed Leadership Team Review Completed	Yes	High
P4	Transfer of documents from the One Stop Shop to the Central Ave facility may result in added delay of processing of easy of easy to issue permits and poses the potential for loss of documents.	Define Courier duties	1/25/2011-Curtis Durrant will establish/define duties	Courier duties have been defined. Now that courier duties have been defined, there is still lag time from pick up time and travel time.	Resolved See SOP 2010-002 outlining responsibility of OSS		
P5	At the end of the review process a dust control plan may need correction. If corrections are not received the permit goes into a hold while attempts to contact with the applicant are made. There is no defined end point to terminate a review following an extended period of no response. In NTV permits, the dust control plan must be		This reference is for Earth moving permits. Permitting cannot proceed with the application without DCP (if required). Permitting does adhere to the 3 letter process. After the 3 rd notice (signed by the Manager), Permitting will close out the permit application, followed by notifying Compliance to request for a site visit to verify closeout or			Yes	Medium

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	submitted together with the application.		issue NOV.				
P6	Applicants are not aware of the status of submitted plans/plans are not tracked adequately to know where they are in the queue	Establish a Tracking system for DCP, Performance Testing schedules with the following columns: submission date,/approval status, Performance Testing schedule on the type of Emission control system(s), status	There is a similar tracker for O&M Plans. Applicants should be notified of the status of their submitted plan.			Yes	Medium
P7	Some inconvenience is experienced by individuals who must go to the OSS for service. Other organizations have the option of OSS <u>and</u> their office location.	Allow permits to be received at 1001 N Central and provide a cashier capability.	Greater customer convenience.		Recommendation developed Leadership Team Review Completed	Yes	High
P8	Should every instance of a no permit violation result in a notice of violation vs. a notice to comply? There are instances where a facility has attempted to identify all appropriate permits but did not identify the need for an air quality permit.	In some cases allow Notice to Comply (NTC) but not NOV to be issued to unpermitted sites. Establish a set period of time for unpermitted business owners to submit an application. Upon expiration of the set period, the NTC will be converted to NOV		This issue moved to Compliance (see C32)	Moved		
P9	Outreach Program-MACT, NESHAP, NSPS. Insufficient effort to reach customers to notify them of their most “recent” obligation due to the promulgation of a new MACT standard	The department should identify an-house MACT Coordinator to identify and track the promulgation of new standards. Provide more assistance to permit applicants (formalize and define); send out alerts to explain new MACT requirements; Be more pro-active in educational communications (workshops); improve the website for information access; applicants need a real person to talk to; more FAQs; use targeted e-mails distribution.	Improved regulatory awareness by permit holders and improved compliance. The concept is in place but imperfect implementation at this time.	We do have a MACT coordinator but there is no specific task description or SOP in place.		Yes	High
P10	Permits are listed by different names between the two current databases; we need to have the name listed as the legal name be the same everywhere for easier searches and verification of	Include in the application package, a copy of the deed and business license	This would help when issuing NOVs and determining fees.			Yes	Medium

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	the correct permit. It would also help if we were able to identify the date that the owner started/took possession of the business.						
P11	Issuance of a permit can result in the requirement to conduct a performance test within a specified timeframe (often within 60 days of permit issuance). If not tracked, the department may not discover a violation for an extended period.	There should be a means of tracking the following in order to better ensure compliance: a. Sources with permit that require a performance test b. Date by which testing is due	Sources that fail to conduct a test within the required timeframe can immediately be cited, reducing time spent in non-compliance and improving timely collection of emission data.	Accela will provide this capability, will only be resolved if and Accela is up and running	Resolved	Yes	High
P12	The internal staff distribution list for internal peer review of a draft permit may not include the right people.	Prior to permit issuance compliance should be given an opportunity to review permit conditions as a means of ensuring enforceability. This might be limited to a subset of permits that represent those sources with high potential emissions or sources of special concern. Draft permit application forms should also be peer reviewed.	Increased enforceability of permit conditions.	Draft conditions do get distributed within the divisions prior to issuance. However, the distribution list has a rather limited list of people. How do we target our internal audience so that the draft conditions do get reviewed?	Resolved Todd Martin sends out a list of draft permits Friday to various people to review the draft permit conditions ; provides opportunity for people from other divisions to make comment on the draft. More names have been added more names to the weekly distribution list. See Comment.		

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P13	Prior to the issuance of a NTV permit or a permit renewal, a source may not be in compliance with all rule/permit condition provisions. If so a compliance plan is allowed. Increased communication is necessary to ensure that any new permit/renewal has a compliance plan, if needed.	There should be a means for ¹ compliance/source test to document and communicate outstanding/ongoing compliance issues to the permitting division for those sources for which a compliance plan would be of benefit.	Reduce time spent in non-compliance and an enforceable pathway to compliance. This would allow compliance plans (Rule 220 Section 303) to be incorporated into pending permit actions to help ensure specific deadlines and milestones are met to return to compliance. See Note ¹ at the bottom of this document	Accela may have a tracker for test frequency.	Recommendation developed	Yes	Medium
P14	Training / Education – Permitting is often the group to first encounter new federal rules or revisions to existing rules. (Also includes Planning as a source of new information)	There should be a process of communicating new requirements so ensure everyone understands the types of facilities affected, and the source's compliance and notification obligations.	More effective inspections, higher compliance rates.	Combine w/P50, P28 and P50	Recommendation developed Leadership Team Review Completed	Yes	High
P15	Document Management / Records: Currently, permitting generates documents (permits, TSD, correspondence) electronically. They are printed out as hardcopies, then scanned into digital format for incorporation into SIRE (digital > analog > digital). In addition to being redundant and inefficient, the final digital file is stored as an image. Text cannot be extracted from an image. As a result, redundant copies of identical documents must therefore be retained in other locations than SIRE.	A different document system other than SIRE should be investigated. The system should have the capability of storing any digital document type. System should have high security so that once documents are saved, they cannot be changed without authorization (most systems of this type have a digital check out and check in process that also tracks document revisions). An SOP will be developed to prevent duplicate scanned document into Sire.	Greatly streamline document and records management and eliminate redundancy			Yes	Low
P17	Some permit review effort may be wasted if an application review is conducted while waiting for a particular element to be submitted.	Hold review until all elements of the permit are complete. Alternatively, obtain concurrence that any hours for review will be compensated even if the permit is not issued due to a failure to submit all necessary elements.			Recommendation developed	Yes	Medium

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P18	The first screening of an application may result in the entire application being returned to the applicant for incompleteness. This is done by mail (or by hand if the applicant is present and cannot correct the application). There is about a 10% rejection rate and there is considerable workload in processing an incomplete application. (Combine w/P23 and P65)	Add a checklist to the application for the customer's use, it could be copied and returned to the customer indicating what is missing.	Reduce the 10% rejection rate by a measurable amount to be determined.	Combined w P23, 65 and 66	Recommendation Developed	Yes	High
P19	Rather than cutting and pasting EVERY part of a specific rule into a source's permit conditions, why not just put in the parts that actually apply to the source.	Modify the text of permits to exclude extensive references (replication) of rules.	Reduce the volume of a permit, make it more understandable and less cluttered.	See Note ¹ at the bottom of the page	Recommendation developed	Yes	High
P20	Create the opportunity for review of certain testing or monitoring requirements within a permit to reduce frequency of that requirement when warranted.				Recommendation developed	Yes	Medium
P21	If monitoring data is required, the department should provide feedback on whether site specific sampling data is OK to use. The permit may require approval first.					Yes	High
P22	The department should provide documentation of decision/policy changes	Post policy documents on website in a way that allows better tracking/updating by customers so they understand what changes are occurring.	Improved understanding of the department's policies and interpretations.		Recommendation Developed	Yes	High
P23	When an incorrect permit application (general or NTV) is submitted, the entire permit application must be returned for re-submittal. (combined with P18 and P65)	Create a permit application that doesn't require the facility to resubmit to OSS if the facility submits an incorrect general or NTV permit application. Another solution, include a cover letter to illustrate the differences between the different general permit & NTV applications, in hopes the cover letter will reduce the number of applications needed to be resubmitted because of the incorrect application. Craft specific emails		Combined w P18, 65 and 66	Recommendation Developed	Yes	High



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		<p>for each permit type.</p> <p>Recommendation: Better education and training of staff. Add a request in the permit application to obtain an email address to facilitate communication with the applicant.</p>					
P24	MCAQ issues general permits to facilities a few months prior to the general permit expiration date and still requires another application prior to the expiration date. Many facilities are confused and do not understand that they need to submit another general permit application prior to the expiration date.	Delay issuance of general permit if near the expiration date, automatically renewing general permit when permit application is submitted close to expiration date, or creating a specific cover letter for the permit applications near their expiration date detailing that another application will need to be submitted prior to the expiration date. When a permit is issued, include a cover letter stating when the next application will be due and identify a phone number for any questions (Jess Lotwala).	It does not look good when MCAQ issues violations to expired general permit facilities even though the facilities submitted and received a general permit less than a year prior.	Same as P41	Recommendation Developed	Yes	High
P25	MCAQ sends annual invoices to permits that are expired. Inspectors then proceed to issue violations to the facility for not having a valid permit, but the facility has been continually paying its annual fees.	<p>MCAQ should not accept annual fees from expired permits.</p> <p>Inspectors can pull expired permit reports at any time and add them to their inspection list.</p> <p>Do a monthly mailing stating permit will expire next month and send to the owner.</p>	Printing the invoices is often when we find that a permit is expired since inspections are sometimes far apart.		Recommendation Developed	Yes	High

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P26	Many inspectors do not receive information concerning the Compliance Permit Review/Comments period for new/renewal NTV and TV permits.	Permitting should send a mass email to all MCAQ personal to review/comment on new/renewal NTV & TV permits.	Also personal in other divisions, such as the Rule Writers, could have great input on new/renewal permits if given the opportunity to review the permits.		Recommendation developed	Yes	Medium
P27	Lack of electronic filing system makes application processing more difficult	Prior to the permit being assigned, all permitting documents, i.e. applications, O&M plans, DCP, should be scanned into SIRE.	Helpful during inspections to clarify issues/claims concerning document submittals.	Recommendation developed		Yes	High
P28	There could be an issue/processes at the facility that the Permit Engineer is unaware of that makes it difficult for the facility to comply with their permit conditions after issuance. Combine P28 with P33	Permit writers should conduct a site visit to all assigned facilities during the renewal or permit modification process	A permit may not cover all regulated aspects of the facility due to a misunderstanding or oversight. By having a permit engineer visit a site while the permit is being reviewed downstream problems , including potential enforcement, can be averted. If there have been a number of violations issued to the facility a visit is even more important..	See Note ¹ at the bottom of the worksheet Combined with P33 Combined with P14 and P50	Recommendation Developed Leadership Team Review Completed	Yes	M-H
P29	Only one person knows the current situation of expired permits, delinquencies, unpaid penalties, and void & waived charges.	Standardize all spreadsheets.		EMS allows access to this information by any staff member.		No	N/A
P30	Mailing out of copies of general permits takes a lot of time and money and may not be necessary.	Email general permits instead of sending by mail. Place a copy of the email cover sheet in the permit file to show when and where it was emailed. Obtain a 2 nd e-mail address as back-up contact. When e-mailing permits, include web-links for forms or other useful information included on our website. E-mailed dust control permits have a link to record forms, gravel pad descriptions, and sign requirements; these forms were mailed with the permits prior to e-mailing.	Given the number of general permits issued the savings are substantial.	Jan 20. Recommendation approved and endorsed by Ken Proksa. To be implemented immediately.	Resolved General permits are being mailed unless there is no email address available.		

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P31	It is unclear how quickly the contents of the courier bag from OSS is distributed. No single person is designated as being responsible.	Identify a responsible individual(s) to complete this task.	Ensure that applications are processed in a timely manner.	DUPLICATE ISSUE REMOVE	Remove		
P32	If an application is found to be incomplete there are several letters issued sequentially if the required information is not provided. This can represent and extended period of time.	The amount of time granted for a response should be standardized.				Yes	Low
P33	On occasion, an application may not fully cover all facility operations that require a permit.	Send a form letter following receipt of an application which reemphasizes the permit applicant's need to ensure that the application fully reflects activity at the source or it could be subject to enforcement.	Ensure that the source double-checks the accuracy of their application.	Combined with P28 Combined with P14 and P50	Recommendation developed Leadership Team Review Completed	Yes	M-H
P34	With the advent of the universal inspector program, other division employees have been approached more frequently by compliance staff seeking answers to questions about permit requirements for permits with which they are unfamiliar. This communication approach limits the knowledge gained to individual inspectors which is not shared systematically to benefit all appropriate compliance staff.	Ensure that communication of permit conditions is more widely shared. This can be accomplished through copying e-mail "answers" to the inspector's supervisor who would then become more knowledgeable and able to assist other staff. Established a "lessons learned" segment in compliance staff meetings to share new information.	Reduce distractions and unaccounted for activity by permitting staff.		Effectively being considered by compliance – Issues C54 and C57		
P35	New permits are opened while the old permit is still open, this causes problems with billing. Also creates extra work for Enforcement, they might issue an NOV even though the ownership is changed.	Research and close any existing permits. In Accela: add a pop-up dialog box, e.g., "want to close, merge, keep fees?"	Would save time and postage.		Recommendation developed	Yes	Medium
P36	Expired permits may be in an expired status for months or even years.	If a permit is expired more than 6 months, conduct a site inspection to verify the status of the facility. If no longer present, close the permit. If still operating, issue NOV and request a new app. Inspectors should conduct a review of expiration dates of permits in their area.		Moved to Compliance Now C70			

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P37	Given the length of time between when a facility receives a renewal notice and when the permit expires, the facility will sometimes set aside the renewal form and forget to respond. Specifically, a general permit can be processed very quickly. The rule requires a permit renewal application to be submitted between 6 and 18 months prior to expiration. A general permit renewal reminder is sent 9 months in advance and then another reminder is sent at the 6 month marker. No other notices are sent. See rule 210, sec 301.2.	Reduce the time between mailing a renewal notice and the permit expiration date. Send notice by email/mail 6 months prior to renewal date. If no renewal has been received 60 days prior to expiration, send a follow-up notice on the 45 th day. Modification of the rule may be required to provide greater flexibility for general permit renewal notices.		Despite this not being rated as a valid issue there was a sense expressed that the renewal is sent too early		No	N/A
P38	New versions of applications and or fee need to be prepared prior to effective date. Applications should be ready at least three months prior.	Update and post new applications on the department's website at least 3 months prior to the effective date (especially important for general permits which have a set expiration date). Clearly identify the last day that an old application will be accepted. Update the website and application cover page prior to the effective date.			Recommendation developed	Yes	Medium
P39	Activities performed for 7 and 30 day Notices do not result in any fee payment and permit engineers are not able to charge for time spent on this activity	All activities performed for 7 and 30 day Notices should justify some sort of payment for staff time.				Yes	Low
P40	An inspector apparently may not make a determination that an activity is de minimus and, therefore, does not require a permit. The result is that a company is advised to submit a permit application (with application fee of \$200) to obtain a definitive determination in those instances where the permit status cannot be readily determined.	If an inspector will not issue an NOV for an activity the inspector believes to be de minimus, a permit application should not be required.	The benefit of an application is that a Permitting Engineer can better evaluate the facility's processes and equipment. If the facility indeed does not require a permit, a de minimus letter will be issued and will document permit status. A letter determination saves time and avoids having to reconsider the issue.		Recommendation developed	Yes	Medium
P41	If a general permit is issued within a short period of time prior to the expiration of the general permit, a new ATO is required when the general permit is renewed. A person initially receiving an ATO shortly before the general permit expires may believe they have the permit for at least a year or longer when in	The ATO letter should include a date when a new application will be required.	Remove the assumption that a general permit may be effective for a longer period of time than it really is.		Recommendation Developed	Yes	High

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	actuality, their authorization will only last a short time.						
P42	Expired permits that are not closed in a timely manner represent a logistical problem. If not officially closed, they remain active in the database system and unintended actions will take place, e.g., issuing invoices, even though the facility may no longer exist.	Ensure that expired permits are quickly investigated and their actual status determined and conveyed so that the database can be quickly updated.			Recommendation developed	Yes	Medium
P43	The potential exists for differing interpretations of the department's rules relating to a de minimus activity that does not require a permit.	A single person should be designated to resolve all de minimus permit determinations to ensure consistency in the application/interpretation of the rules.	Engineers are assigned permits. Each and every engineer has the ability to make the determination during TSD/Research			Yes	Medium
P44	Individuals preparing a permit application need guidance while the application is being developed. It is difficult to identify the appropriate individual to contact.	Phone and e-mail contact information should be posted on the department's website to allow permit applicants to reach an individual staff member to help resolve questions about the permit application. Add access information on the website. Place access information on the permit applications to make contacting the department easier.	Early assistance while an application is being developed has the potential to improve the quality of permit applications and will lead to permits that can be processed more quickly.				
P45	The potential exists for funds that may be a "credit" for one permit application may not be readily available to the permit applicant under certain circumstances.	Maintain a database showing old permit number and amount available for credit when application received. E-mail this list on a weekly basis to OSS. Add comments on EMS as appropriate. If application is not submitted within two months process a refund. Develop standard operating procedure to address application fee redirection; applicant should receive something to document the credit.		Linked with P48	Resolved A new SOP has been developed to address this issue. See SOP-2011-001		
P46	Once a permit is issued, there may be a need for continuing discussions with the Permittee as the Permittee seeks clarification about permit conditions. The time spent by a permit engineer on this activity is not charged to the permit holder.	After the issuance of a permit, the permit writer can no longer charge their time against the permit. Queries should be directed to small business assistance instead of permit staff	Is this an activity that is paid for by the annual fee? Should the cost of this activity be charged to the Permittee?				

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		Place more emphasis on educating the permit applicant on the content/obligations of the permit before it is final or through permit issuance.	Avoid issue shopping to find staff with the desired answer.				
P47	A permit application under review by a permit engineer may be delayed if the permit engineer becomes too busy.	A mechanism should be established to shift the work to another permit engineer who may have time to work on the application.			Recommendation developed	Yes	High
P48	Fees paid for an application may need to be applied to another application under certain conditions.	Establish policy allowing application fees to be transferred to a different application when specified conditions are met.		Linked with P45	Recommendation developed	Yes	High
P49	Permit holders may not be aware of a change in the Fee Table to which their permit is assigned. This creates confusion and unnecessary follow-up when an invoice is sent and the fee charged is a surprise..	Proactively advise permit holders when a Fee Table status change occurs. Provide an opportunity for revisiting the Table designation for the facility.	Reduce customer confusion, promote better customer planning to be able to budget for the increased costs. Allow an opportunity to reassess the Table selection and its applicability.		Recommendation developed	Yes	Medium
P50	Too much time is being taken by the inspector to determine compliance with standards that the permit engineer should have made when drafting the permit.	Permit conditions should be crafted so that compliance with the condition can be readily determined.	Clear permit conditions would allow the permit holder to understand their obligation and compliance could be more easily achieved. Clear permit conditions allow an inspector to readily determine whether compliance has been achieved.	Combined with P14 P28 and P50	Recommendation developed Leadership Team Review Completed	Yes	High
P51	A fee paid for a general permit that is not required may not be refunded. Refunds are only processed unless requested. The “no permit needed” scenario.	Develop a policy that addresses circumstances where a fee refund is appropriate. Modify Rule 280 if necessary.	A policy statement on how to handle fees paid for unnecessary permit applications would resolve this ambiguity. A standard operating procedure should be developed to handle such situations.		Recommendation developed	Yes	High
P52	A permit application may be submitted in response to a “no permit” NOV being issued. Upon review, it may be determined that a permit was not required. The permit applicant, however, has lost an application fee and time preparing the application when it was not necessary.	Develop a policy that addresses circumstances where a fee refund is appropriate. Modify Rule 280 if necessary. Establish a protocol that requires confirmation of the need for a permit prior to issuing an NOV for no permit. Perhaps consultation with permitting prior to issuing an NOV?	A policy statement on how to handle fees paid for unnecessary permit applications would resolve this ambiguity. Facilities would benefit by not having to spend time and funds pursuing a permit that is not required.		Recommendation developed	Yes	High

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P53	Mailed-in requests for subcontractor licenses have a high rate of failure – 30 to 40% do not pass AZ Corporation Commission validation. These are difficult to clear and are placed into indefinite hold.		Clearing applications that are “on hold” would improve service delivery and improve administrative systems.		Recommendation developed	Yes	High
P54	General permits represent a large number of the total permits issued by the department yet few staff are involved in this effort.	A manual should be developed to ensure that the general permit issuance process is clearly understood.	The ability of the department to issue general permits would be improved.			Yes	High
P56	De minimus permit determination letters are being sent to the applicant using certified mail. There may be no reason why letters are required to be sent certified.	Review the reason for sending de minimus permit determination letters. If not required, use regular mail or e-mail (preferred).	Cost savings realized. If letters are emailed – there is less administrative costs.	Decision made to not use certified mail in future	Resolved Deputy director determination to implement immediately	Yes	High
P57	Some facilities request a permit even though a permit is not required. The department is granting these requests.	Permits should not be issued when they are not required.	Activity imposes additional costs and conditions on facilities when they are not required. Imposes risk of enforcement action for non-compliance when no permit is required. If no permit were issued the facility would not be subject to these costs and risks.		Recommendation developed	Yes	Med-Low
P58	The existing de minimus letter may not adequately meet facility needs.	Review template of de minimus determination letter and strengthen, if required, to provide greater clarity/value.	Provide perceived missing elements. Change language in letter – Li Sa committed to doing.		Resolved Revised letter completed and now being used.	Yes	High
P59	Subcontractor registrations go into an indefinite hold when information cannot be verified and the applicant cannot be contacted.	Establish criteria or a policy limiting the indefinite hold.	Resolve ambiguous status of applicants	Combined w/P53 Duplicate issue			
P60	Operations and Maintenance (O&M) Plans for non-Title V permits are not reviewed by the permit writer. This can lead to imperfect reviews even though the O&M Plan is approved.	If possible, O&M Plans should be reviewed by the permit writer who worked on the original permit.	Review of the O&M Plan by the permit writer most familiar with the permit may result in a more complete and informed review/approval.	Concurrence and implementation by Division Manager	Resolved decided and approved by Mgr and Supervisors that O&M Plan will no longer be routed.		



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P61	Facilities may have multiple sources, e.g., IC engines, gasoline tanks, fuel burning equipment, and solvent cleaning operations which may be addressed through permit conditions. An inspection of a sand and gravel facility covered by Rule 316 may not refer to these other sources in the inspection reports. The facility's comprehensive compliance status is, therefore, not fully understood on the basis of reviewing the inspection report.	The Renewal Report Batch Run (that is currently conducted by a DST) at OSS should be run at Central or vice versa. Currently, the report is batched run at OSS and couriered over to Central for Diana to stuff the envelopes to be mailed out.	The department and the facility would have a record of the entire compliance status or whether the inspection was narrowly focused on only a portion of the rules.	This issue moved to Compliance Now at C35	Moved		
P62	A greater sense of teamwork is needed and an understanding that each division within the department must rely on the other to be fully successful in meeting the department's mission.	Ensure that the message of mutual reliance is conveyed to all staff and that each staff member better understands the needs of other staff and the importance of shared information to achieve organizational goals.	Improved coordination and clarity of rules, permit conditions and enforcement actions.	Move to a Leadership Team/ESS issue	Move to a Leadership Team/ESS issue	Yes	Moved
P63	All documents that are relevant to a facility should be scanned and entered into SIRE.	Scan new emissions inventory reports and test reports into SIRE.	Will increase efficiency of employees needing to access emissions inventory reports and test reports. Additionally, will keep reports from being lost, damaged or misfiled.		Recommendation developed	Yes	Med-High
P64	Permits are difficult to comprehend to many permit holders which leads to non-compliance by virtue of just not understanding what is required.	When a permit is issued, provide an easy to understand guide to basic permit compliance expectations. Create "cartoon-like" flyers to explain some common compliance-related practices, e.g., drycleaner perc testing, use of gasoline spill containment plug. Provide more training outreach; permit writers should visit facilities as part of part of permit drafting; inspector should participate in applicant pre-meetings.	Will improve compliance by increasing understanding of permit and permit holder obligations.				
P65	Submitted permit applications are often not complete (combined with P18 and P23 and P66)	Develop a checklist or other similar aide to allow a permit applicant to submit all required documents.	Reduce the number of incomplete applications/faster permit turnaround for applicants	Combined w/ P18, 23 and 66		Yes	High

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P66	Technical assistance in preparing permit applications would be very helpful in reducing application fault percentage (combined with P18, P23 and P65)	Consider establishing a short term rotational opportunity for some staff to provide technical assistance in permit preparation to enhance customer service	Reduce number of complete applications, improve staff understanding of permit application requirements, more satisfied applicants	Combined w/ P18, 23 and 65 Not a separate issue	Merge with P65	Yes	High
P67	The O&M Plan approval is routed through Compliance. This not a necessary step.	Change submittal of O&M Plan to go direct to Permitting.			Recommendation developed	Yes	Medium
P68A	It is not clearly understood when an O&M Plan was submitted. This can result in delayed enforcement and extended noncompliance.	Create a database or periodic printout to identify any outstanding O&M Plans. A new column is to be added to the existing data base that will fulfill this need.	Ensure more timely submittal of O&M Plans.		Resolved See P60	Yes	
P68B	It is not clearly understood for what equipment or processes an O&M Plan is required.	Develop a brief guidance document that provides direction and specific examples.					
P69	On occasion, a permit renewal may contain changes more properly covered in a minor modification. The changes may be inadvertently approved.	Provide greater clarity concerning the obligation to separate renewals from minor mods and create a system check to ensure that improper renewals are identified.	Conforms practice to regulation.	Reconsidered – no longer an issue - dropped	Resolved	Yes	High
P70	Some facilities are simply not aware that a permit is required for an activity. In some instances, other county permits have been obtained so awareness is the major factor in their not obtaining a permit.	Establish a county webpage that lists permits required by activity. Establish improved interagency awareness of permit requirements and create educational tools that are activity-related not single agency-focus Achieve improved coordination with other county/city departments. (no specific suggestions of how to achieve).	Will result in more unpermitted facilities self-identifying and obtaining permits				
P71	Due to the absence/lack of a tracking system, time sensitive paperwork gets delayed, which in turn may result in issuance of NOV.... and ...subsequently extensive shuffling of paperwork which consume MORE time from Compliance, Enforcement and Permitting.	Create a tighter documentation system such as “establishment of a chain of custody” for all paperwork hand-off throughout EVERY step.			Recommendation developed	Yes	High

Permitting Workgroup Issue Identification

	Issue	Recommendation	Benefit	Comment	Status	Valid Issue	Priority
P72	Internal review of non-title V permits was recently determined to be truncated: Compliance & Enforcement had not for some time been able to provide comments	Reinstitute a means by which Permitting can receive useful feedback on draft permits from Compliance staff. Given reasonable compliance review, better permit quality will be realized as a matter of course.		Recommendation recently implemented by Permitting and Compliance	Resolved: Each posted draft permit is assigned for review to a supervisor; exchange of information is done electronically; follow up is given by the assigned permit engineer.		
P73	Permits contain complicated requirements/conditions that may not be understood or complied with and may lead to difficulty in proving a violation if not identified early on.	Schedule compliance assistance (courtesy) style inspection prior to or just after permit issuance. This would be for all types of permits to ensure ongoing compliance through the lifetime of the permit.	Early compliance is assured. Ability to prove a violation is enhanced.	Duplicate issue	Duplicate issue		
P74		Eliminate OSS renewal run to routing/mail distribution. Instead, have DST run report at Central Ave.					
P75	When inspectors issue a “no permit” NOV, they use a separate form.	Send a draft of the NOV to OSS to avoid duplication of entry.		Move to compliance	Moved		
P76	How long should each type of permittee be given to submit an application after an NOV is issued?			Move to Compliance	Moved		
P77	Documentation of closing an NOV without a disposition inspection?			Move to Compliance	Moved		
P78	Performance testing has a backlog and the activity of performance testing is inherently more of an engineering task than a compliance task.			Move to Compliance	Moved		

Permitting Workgroup Issue Identification

	Issue	Recommendation	Benefit	Comment	Status	Valid Issue	Priority
P79	The placement of performance testing in a division separate from Permitting creates the opportunity for miscommunication and represents an inefficient use of resources.	Performance Testing should be repositioned in the Permitting Division since permit writers and testing staff are all engineers by education.	The potential exists for cross-training and shared tasks. Potentially, back-logs can be reduced and a more efficient staffing structure realized.	Moved to Compliance list – Now C 65	Moved		
P80	When a permit close out is requested via permitting, should an inspector be notified to conduct a final closeout walk through of a facility; verify lock out tag out and equipment break down?	A policy for permit closeouts should be developed addressing both permit and compliance-related concerns.		Move to Compliance Now C68	Moved		
P81	Inspectors are not allowed to change a complaint's status.	Inspectors should be allowed to change status after being assigned a complaint.	More efficient/timely updating of the database.	Move to compliance Now C59	Moved		
P82		Develop a permit "close-out" process chart		Not an issue delete		No	N/A
P83	Currently there is a 14 day calendar day timeline on the approval of dust permits. This may be too long a period for some projects that wish to start immediately.	Create a special fee for the fast processing of dust permits	Improved customer service.			Yes	High
P84	The use of the term de minimus may be confusing if used in a letter to a permit applicant. The term is used as short hand to mean a non-regulated activity.	Clarify the use of the term de minimus in our correspondence. Use "non-regulated activity" in place of "de minimus."	Clarity in language and understanding.	Same as P58	Resolved		
P85	The Non Title V application that is required to be filled out is unsuitable (overkill) for a site with only a large generator.	Revise application		Intention is to transition emergency generators to a general permit	Recommendation developed	Yes	Medium
P86	Inconsistent permit conditions (e.g. inconsistent performance test requirements and/or Subpart OOO opacity requirements) make it difficult to consistently determine compliance with requirements and may also lead to unfair competitive advantage for one facility versus another of the exact same type.	Update and rework permit condition templates to assure consistency in permit requirements and compliance mechanisms.	This will improve compliance and enforceability while simultaneously "leveling the playing field" thereby assuring that all facilities in the same source category are treated in an equitable manner.		Recommendation developed	Yes	Med-High



Permitting Workgroup Issue Identification

	Issue	Recommendation	Benefit	Comment	Status	Valid Issue	Priority
P87	Performance testing is facing a significant workload backlog. A formal written report (data entry and report writing) are time intensive and contribute to the backlog given the staff allocation.	<p>Conduct a cursory review of test reports. Data and calculations would undergo an abbreviated review and consistency check.</p> <p>A 1-page summary memo (highlighting what equipment was tested, the type of tests done and the emission results) may substitute for a full blown multi-page test report review.</p>	<p>This action would result in accelerated backlog elimination, more efficient use of resources to cover more facilities in a shorter amount of time, identification of potential emission/compliance/testing issues and improved communication between Performance Testing, the test company, the facility, and other divisions within MCAQD.</p> <p>This would save time, free up resources and help eliminate the test report backlog. If an issue arises on a past test that is being reviewed, then the reviewing engineer can alert the Performance Test supervisor who can document it in a database (or spreadsheet) and make the Performance Test group (and Permitting and Compliance Divisions) aware of the issue (whether it is test method or emissions related) so they can watch for it on future performance tests, inspections and permit renewals/modifications. The supervisor can also contact the facility and/or test team and make them aware of it so they can correct the issue if necessary.</p>	Moved to compliance Now C69	Moved		
P88	Online payment of fees and submittal of applications is not currently available.	Explore potential to improve customer service and gain efficiencies by providing more online options.				Yes	High
P89	Permit requirements need to be understood by businesses when determining whether to open or relocate a business.	Ensure that business organizations, e.g., Chambers of Commerce and Economic Development organizations are aware of air quality permits.	<p>Improve the transparency of government requirements.</p> <p>Make it easier for businesses to conduct their permitting due diligence.</p>				
P90	A permit applicant may not know the status of a permit application following its submittal.	Schedule a meeting for each new permit application submitted (there needs to be a threshold cut-off based on the size or complexity of the permit) to kick-off the permit review.	<p>If conducted internally, will allow for a faster screening.</p> <p>If conducted with the applicant it will promote a faster identification/response to permit deficiencies.</p> <p>Consider establishing a weekly scheduled opportunity for new applicants to come in to review their submitted permit applications with staff.</p>				

Permitting Workgroup Issue Identification

	Issue	Recommendation	Benefit	Comment	Status	Valid Issue	Priority
P91	Permits may require “tweaks” to improve content and enforceability but the identification of “tweaks” is not systematized.	Establish a periodic meeting to review permits by category to consider frequently asked questions about the class of permit.	Early identification of concerns about permit language and faster clarification/resolution of the concern.				
C92	General permits represent an expedited permit issuance process but not all opportunities for developing general permits for other classes of permits have been explored.	Conduct a comprehensive review to determine if any additional permit categories are appropriate for conversion to a general permit.	Greater efficiency in permit processing.				
P93	Some activities now required to obtain a permit may represent very small to insignificant emissions.	Review permit categories to determine if some regulated activities now requiring a permit should be converted to non-regulated status not requiring a permit.	Greater efficiency in permit processing. No longer necessary to conduct an inspection at a source representing insignificant levels of emissions.				
P94	Compliance and permitting have different views on what exactly collocation means. Our department needs a more clear (black/white) definition of what collocation is. We have two documents at this time- one from the lawyer and one from Doug Erwin. The documents are different and I do not think either one is “official.”	Develop a clear policy statement on collocation.	It would be beneficial to the customer if we had an answer at the time of the inspection. Having a clear policy/interpretation would reduce aggravation with the department.				
P95	It is difficult to determine how long a portable has been in the County- what proof do we need as inspectors?						
P96	Some facilities/construction sites rent a piece of equipment (let’s say a crusher). The equipment is not permitted by the owner because they do not want responsibility, so the lessee takes out the permit. Our permits can take up to 6 months to approve, often this equipment is needed ASAP. Today I have heard that the average time for NTV to get approved is 37 days, while better this amount of time is still too long for this specific issue.	Create a temporary permit option.					

Permitting Workgroup Issue Identification

	Issue	Recommendation	Benefit	Comment	Status	Valid Issue	Priority
P97	Tracking of state portables entering and working within the County is difficult to track. Many of these facilities are not regulated.	Create a temporary permit option.					
P98	Violations are issued to facilities that have a state permit, but they have been working within the county for >5years ??	Determine whether a violation is necessary for these types of sites.					
P99	Technical support documents are not provided for all permits.	Provide a technical support document including calculations at the same time draft permit conditions are submitted to the permit applicant for review.	Increase permit applicant understanding of how operating limits were determined and provide justification for the permit condition.				
P100	Permits only reference the rule and section number.	Include the sub-section number as a reference to the permit condition.					
P101	Permit engineers do not, in all cases, visit a site when developing a permit application.	Schedule a site visit by the permit engineer and compliance staff during permit review to confirm accuracy of the facility equipment list.	Avoid apparent breakdown of communication experienced by the facility. Ensure that everyone agrees on naming conventions and applicability of all equipment listed in the permit to alleviate future confusion by all parties.				
P102	If you have both 310 and 316 sites you should be able to send everyone to the 316 water truck course. It is the more stringent rule, and it is an unnecessary burden to have to get people through both just to be able to run a water truck and implement controls (which is the objective).	Allow inter-changeability between training.	Reduce training burden while achieving equivalent result.				
P103	The Contents of an O&M Plan such as the operating parameters & maintenance schedules, plus its respective recordkeeping logs are often (not always), part of the permit conditions.	Determine if maintaining a separate O&M Plan is necessary.	Less complex permit requirements Easier to attain compliance				

Permitting Workgroup Issue Identification

	Issue	Recommendation	Benefit	Comment	Status	Valid Issue	Priority
P104	Dust Control Permits are only good for one year then they must be reissued. When reissued, an inspector will not know that the permit is for a continuing operation. Inspections may be conducted at a site that has already been inspected adequately.	When reissuing a dust permit, append the new number to designate an extended permit on the same site. Revise the permit requirement so that a dust permit can be issued for longer than one year. Create a general permit for dust operations below a certain size threshold.					
P105	When an error (e.g., EMS, P+, and/or paperwork) is discovered the tendency is to resolve the concern for the immediate circumstance without addressing the underlying cause.	Create an expectation that any data entry issue is brought to the attention of the appropriate manager and that a system fix is initiated to resolve the problem to avoid recurrences.	Will help to create a more professional impression externally.				

¹ Over the past 2 years, permit writers have been encouraged to conduct site visits to verify processes at facilities. By doing so, permit writers better understand of the processes at the facility, and the permit conditions requirements will better reflect the “true” activity.

A “good” permit condition depends on the information PROVIDED by the applicant. It is the responsibility of the applicant to provide detail information in the application form. If the applicant is unsure and/or requires assistance in filling out the application form, any permit engineer will be able to provide assistance.

It takes at least one permit cycle to identify/correct the error.
As older permits come due for renewal, updates will reflect permit language improvements.